

# **EXHIBIT 2**

LISA M. HOLLIDAY, Ph.D. - APRIL 13, 2018  
IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

SEAN SMITH and CRYSTAL SMITH, )  
  )  
Plaintiffs,                            )  
  )  
VS.                                     ) No. 5:17-CV-1302D  
  )  
CSAA FIRE AND CASUALTY             )  
INSURANCE COMPANY,                 )  
  )  
Defendant.                            )

\* \* \* \* \*

DEPOSITION OF LISA M. HOLLIDAY, PH.D.,  
TAKEN ON BEHALF OF THE PLAINTIFFS  
ON APRIL 13, 2018  
IN OKLAHOMA CITY, OKLAHOMA  
COMMENCING AT 9:53 A.M.

\* \* \* \* \*

REPORTED BY: KORTNEY V. HOUTS, CSR

1 No.

2 Q You don't remember --

3 A There was lots of humps.

4 Q What about a collapsed joist? Do you recall  
5 anything like that?

6 A No.

7 Q Do you recall whether or not you walked  
8 over -- when I say collapsed floor joist, do you  
9 understand what I'm referring to?

10 A Well, I understand the technical meaning of  
11 collapsed. We certainly didn't see anything collapsed  
12 or any sign of anything collapsed there.

13 Q If something had collapsed, what would that  
14 feel like when you're walking across the floor?

15 A Collapse is a complete break of the member,  
16 and that would have been very obvious.

17 Q What if it had fallen over? What would you  
18 call that?

19 A Fallen over.

20 Q Do you recall a fallen-over floor joist?

21 A No.

22 Q Do you recall walking over something that  
23 was -- were you looking for those types of things?

24 A We were not.

25 Q You weren't looking for fallen floor joists?

1           **A**    We were not doing a full, thorough structural  
2 evaluation of the house.

3           **Q**    If you were walking through the -- well, if  
4 you're walking through the living room and you walked  
5 over a fallen floor joist and there was a trough in the  
6 floor, is that something that you would have wanted to  
7 investigate?

8           **A**    Probably just -- yes. But it seems like --  
9 if there would have been something that dramatic, yeah,  
10 it seems like they would have called an engineer  
11 themselves.

12          **Q**    If there was something --

13          **A**    If there was -- if I was a homeowner and  
14 there was a gaping hole in my floor, I would call an  
15 engineer.

16          **Q**    If there was a -- if there was something like  
17 that when you arrived at the Smiths', is that something  
18 you would have investigated in the crawlspace?

19          **A**    Yeah.

20          **Q**    Would that be -- would that be indicative of  
21 earthquake damage in that home?

22          **A**    No.

23          **Q**    You don't think so?

24          **A**    Not -- not the first signs of damage.

25          **Q**    Again, this would be something where you'd